

MAY 07 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

DAVID J. MALAND, CLERK
BY
DEPUTY _____

UNITED STATES OF AMERICA

§

NO. 1:15-CR-69

§

v.

§

Crone/Giblin

§

IAN CHRISTIAN ANDERSON

§

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

Violation: 18 U.S.C. § 2422(b)
(Enticement of a Minor)

On or about March 20, 2015, in the Eastern District of Texas, the defendant, **Ian Christian Anderson**, did use any facility of interstate and foreign commerce, to wit, the Internet and a cellular telephone, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, to wit, Tex. Penal Code § 22.011(a)(2) (Sexual Assault).

In violation of 18 U.S.C. § 2422(b).

COUNT 2

Violation: 18 U.S.C. § 2422(b)
(Enticement of a Minor)

On or about March 21, 2015, in the Eastern District of Texas, the defendant, **Ian Christian Anderson**, did use any facility of interstate and foreign commerce, to wit, the

Internet and a cellular telephone, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, to wit, Tex. Penal Code § 22.011(a)(2) (Sexual Assault).

In violation of 18 U.S.C. § 2422(b).

COUNT 3

Violation: 18 U.S.C. § 2423(b) (Travel with Intent to Engage in Illicit Sexual Conduct)

On or about February 15, 2015, in the Eastern District of Texas, and elsewhere, the defendant, **Ian Christian Anderson**, did travel in interstate commerce for the purpose of engaging in any illicit sexual conduct with another person; to wit: **Ian Christian Anderson** travelled from the State of Maryland to Lumberton, Texas for the purpose of engaging in sexual conduct with a minor that the defendant knew or reasonably believed to have not attained the age of eighteen years.

In violation of 18 U.S.C. § 2423(b).

COUNT 4

Violation: 18 U.S.C. § 2423(b) (Travel with Intent to Engage in Illicit Sexual Conduct)

On or about March 16, 2015, in the Eastern District of Texas, and elsewhere, the defendant, **Ian Christian Anderson**, did travel in interstate commerce for the purpose of engaging in any illicit sexual conduct with another person; to wit: **Ian Christian Anderson** travelled from the State of Maryland to Lumberton, Texas for the purpose of

engaging in sexual conduct with a minor that the defendant knew or reasonably believed to have not attained the age of eighteen years.

In violation of 18 U.S.C. § 2423(b).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 18 U.S.C. § 2428

Upon conviction of one or more of the offenses, alleged in Count One of this indictment, **Ian Christian Anderson**, defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 2428, and all property, real and personal, used or intended to be used to commit or to promote the commission of the offense, specifically:

- (a) an Apple iPhone cellular telephone, model A1586, belonging to the defendant
- (b) an Apple MacBook Pro, model number 1286
- (c) an Apple iPad, 64 gb S/N DLXH83WHDNQV
- (d) a Western Digital external hard drive, S/N WMX1EA0EFT94
- (e) a STA hard drive, S/N WCATR9058627

Moreover, if any property subject to forfeiture, as a result of any act or omission by the defendant:

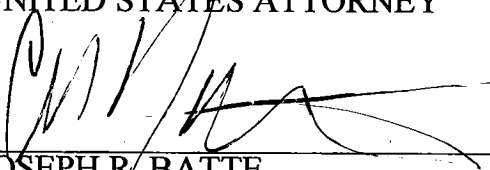
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL

CAS
GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY



JOSEPH R. BATTE
ASSISTANT UNITED STATES ATTORNEY

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v.

IAN CHRISTIAN ANDERSON

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NO. 1:15-CR- 69

NOTICE OF PENALTY

Counts 1 and 2

Violation: 18 U.S.C. § 2422(b) (Enticement of a Minor)

Penalty: Imprisonment of not less than ten (10) years, but up to life; a fine not to exceed \$250,000.00 or twice the pecuniary gain to the defendant or loss to the victim; or both imprisonment and a fine. A term of supervised release of not less than five (5) years, but up to life may be imposed.

Special Assessment: \$100.00

Counts 3 and 4

Violation: 18 U.S.C. § 2423(b) (Travel with Intent to Engage in Illicit Sexual Conduct)

Penalty: Imprisonment of not more than 30 years; a fine not to exceed \$250,000.00 or twice the pecuniary gain to the defendant or loss to the victim; or both imprisonment and a fine. A term of supervised release of not less than five (5) years, but up to life may be imposed.

Special Assessment: \$100.00